

Bremerton ❖
Kitsap County
Health District

Scott W. Lindquist, MD, MPH, Director
109 Austin Drive
Bremerton, WA 98312

January 22, 2002

Mr. Steven Alexander
Toxics Clean-up Program
Ecology-Northwest Regional Office
3190 160th Ave. SE
Bellevue, WA 98008-5452

RECEIVED
JAN 23 2002
DEPT OF ECOLOGY

RE: GORST CREEK/BREMERTON AUTO WRECKING LANDFILL

Dear Mr. Alexander:

when it is deemed appropriate in compliance by whom?
The Bremerton-Kitsap County Health District (Health District) respectfully requests that Ecology initiate remedial activity under the Model Toxics Control Act (MTCA) for the above referenced contaminated site located in Kitsap County. This site is a landfill originally closed under Chapter 173-301 WAC. The Health District performed a Site Hazard Assessment (SHA) for this site in January 2002. The hazard ranking for the site is a 1. Based on this ranking, and recent degradation of site conditions due to excessive rainfall, and the potential release of hazardous substances into Gorst Creek, the Health District requests that Ecology initiate remedial actions as soon as possible.

Background

The site is a closed mixed municipal solid waste landfill that operated from 1968 to 1989. This unlined landfill also contracted to accept solid waste (including industrial/chemical wastes) from the Puget Sound Naval Shipyard. The landfill was sited in a ravine that Gorst Creek currently flows through. Gorst Creek is a salmon stream and 2.5 miles from the landfill empties into Sinclair Inlet of Puget Sound. During the start of fill operations a culvert was installed and the creek was piped under the landfill. Estimates from Health District records indicate that the landfill may hold as much as 30,000 cubic yards of waste.

authorized & regulated (SRA)
In March 1997 Health District staff discovered a slide on the southwest corner of the landfill into Gorst Creek. The slide exposed waste on the face of the slope and dumped waste into the creek. The Health District worked with the owners of the site, the Washington State Department of Transportation (DOT), the US Navy, and other parties to stabilize the slope and remove waste from the creek. Sampling of the creek was conducted by the DOT in April 1997, and in October 2000 a site hazard assessment (SHA) was conducted by Hart Crowser for the Navy. Ecology issued Early Notice Letters under MTCA to the previous owners (Uhincks) and the Navy in

POULSBORO ANNEX
Environmental Health Division
19540 Front Street

Mailing Address: P.O. Box 1076 - Poulsbo, WA 98370-0050
(360) 692-3611 FAX (360) 692-6684

KITSAP NB (GORST) N44255_000880
5090.3.C SF SECTION 26.5

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December 1997. The US Navy's involvement in remedial actions began in May 1998 (see May 28, 1998 letter from Navy to TCP).

Subsequent to remedial actions taken to repair storm damage at the landfill in 1998, the Navy undertook a site hazard assessment with the intent of pursuing either voluntary or independent remedial action at the site (see Site Hazard Assessment, Gorst Creek Landfill, October 13, 2000). The Navy concluded all cleanup activities at the site in early 2001 in response to Ecology's insistence that the MTCA residential clean-up standard be used at the site.

The Health District has made numerous visits to the site over the last four years checking on the condition of the slope and stability of the fill. A major slope failure would threaten State Route 3 by blocking the culvert that runs under that road. During the 1997 slide and recent heavy rain events, surface water runoff has backed up behind the fill as the drainage culvert is partially blocked and does not have the proper flow capacity. Water backing up behind the fill has run over the top of the landfill and created slides and washouts on the downslope face above Gorst Creek.

The Health District proceeded with ranking of Gorst Creek Landfill under MTCA at the request of Ecology. The Health District is of the opinion that this site should be a higher cleanup priority because: (1) the recommended site hazard ranking - 1; (2) the immediate threat posed by failing slopes and potential discharge of hazardous substances to Gorst Creek, and (3) the Navy's discontinuation of clean-up activities at the site.

The Health District appreciates Ecology's consideration of this request. Please notify the Health District of the TCP staff assigned to this site and of any assistance the Health District can provide in familiarizing staff with the history of the site. If you have any questions please feel free to call. I can be reached at (360) 692-3611, ext. 235.

Sincerely,



Jan Brower
Solid and Hazardous Waste Program Manager

Enclosure May 28, 1998 letter from Navy
 Navy SHA Report Cover
 Navy Letter Concluding all Clean-up Activities

Cc: Dr. Scott Lindquist, BKCHD
 Mr. Jerry Deeter, BKCHD
 Mr. Keith Grellner, BKCHD
 Mr. Scott Daniels, BKCHD
 Mr. Vern Padgett, Owner
 Mr. Larry Tucker, USN
 BAWL File